

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

PETE LIVINGSTON,

Plaintiff,

v.

KEYA MORGAN aka KEYARASH  
MAZHARI aka KEYA MAZHARI, KEYA  
GALLERY,

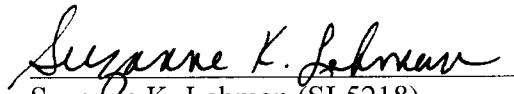
Defendants.

Case No. 07 CV 7835 (RMB) (KNF)  
**Certificate of Service**

I hereby certify that the foregoing Motion for Admission Pro Hac Vice, Affidavit in Support of Motion for Admission Pro Hac Vice and Order for Admission Pro Hac Vice were served on all parties in the above captioned matter via first class mail addressed as follows:

Kenneth Silverman, Esq.  
Matt Bryant, Esq.  
32 Middagh Street, #16  
Brooklyn, NY 11201

Dated: June 23, 2008  
Syracuse, New York



Suzanne K. Lehman (SL5218)  
SMITH, SOVIK, KENDRICK & SUGNET, P.C.  
250 South Clinton Street  
Suite 600  
Syracuse, New York 13202  
Phone: (315) 474-2911  
Fax: (315) 474-6015  
[slehman@smithsovik.com](mailto:slehman@smithsovik.com)

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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Plaintiff,

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KEYA MORGAN aka KEYARASH  
MAZHARI aka KEYA MAZHARI, KEYA  
GALLERY,

Defendants.

Case No. 07 CV 7835 (RMB) (KNF)  
**Affidavit of Suzanne K. Lehman in  
Support of Motion to Admit Counsel  
Pro Hac Vice**

STATE OF NEW YORK                    )  
  )     SS:  
COUNTY OF ONONDAGA                )

SUZANNE K. LEHMAN, ESQ., be duly sworn, hereby deposes and says as follows:

1. I am an attorney at Smith, Sovik, Kendrick & Sugnet, P.C., counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Geoffrey Taft as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on September 5, 2007. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Geoffrey Taft since May 2008.

4. Mr. Taft is a sole practioner with an office located at 831 Carmel Ave, Albany, California 94706. Plaintiff Pete Livingston seeks to have this attorney represent him in this Court insofar as he is familiar with the facts of this case.

5. I have found Mr. Taft to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

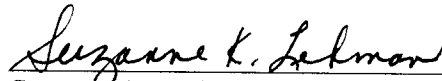
6. Accordingly, I am pleased to move the admission of Geoffrey Taft, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Geoffrey Taft, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit GEOFFREY TAFT, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: June 23, 2008  
Syracuse, New York

Respectfully submitted,



Suzanne K. Lehman (SL 5218)

SMITH, SOVIK, KENDRICK & SUGNET, P.C.

250 South Clinton Street

Suite 600

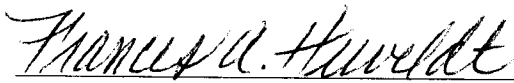
Syracuse, New York 13202

Phone: (315) 474-2911

Fax: (315) 474-6015

[slehman@smithsovik.com](mailto:slehman@smithsovik.com)

Sworn to before me this  
23<sup>rd</sup> Day of June, 2008.



Notary Public

FRANCES A. HUVELDT  
Notary Public in the State of New York  
Qualified - Onondaga County No. 5073753  
My Commission Expires March 3, 2011

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FOR THE SOUTHERN DISTRICT OF NEW YORK

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Defendants.

Case No. 07 CV 7835 (RMB) (KNF)  
**Order for Admission Pro Hac Vice  
On Written Motion**

Upon the motion of Suzanne K. Lehman attorney for Plaintiff Pete Livingston and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Geoffrey S. Taft

Firm Name:

Address: 831 Carmel Ave

City/State/Zip: Albany, California 94706

Phone Number: (510) 527-0588

Fax Number: (510) 526-5096

Email: [jeffstaft@hotmail.com](mailto:jeffstaft@hotmail.com)

is admitted to practice pro hac vice as counsel for Plaintiff Pete Livingston in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: June \_\_\_\_\_, 2008  
New York, New York

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United States District Judge

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Case No. 07 CV 7835 (RMB) (KNF)  
**Motion to Admit Counsel Pro Hac Vice**

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Suzanne K. Lehman, Esq., a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission pro hac vice of:

Applicant's Name: Geoffrey S. Taft

Firm Name:

Address: 831 Carmel Ave

City/State/Zip: Albany, California 94706

Phone Number: (510) 527-0588

Fax Number: (510) 526-5096

GEOFFREY TAFT is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against GEOFFREY TAFT in any State or Federal Court.

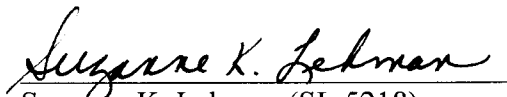
Dated: June 23, 2008  
Syracuse, New York

JUN 24 2008

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FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JUN 24 2008

Respectfully submitted,

A handwritten signature in cursive script, reading "Suzanne K. Lehman". The signature is written in black ink and is positioned above a horizontal line.

Suzanne K. Lehman (SL 5218)  
SMITH, SOVIK, KENDRICK & SUGNET, P.C.  
250 South Clinton Street  
Suite 600  
Syracuse, New York 13202  
Phone: (315) 474-2911  
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[slehman@smithsovik.com](mailto:slehman@smithsovik.com)



## THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

MEMBER SERVICES CENTER

TELEPHONE: 888-800-3400

June 11, 2008

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, GEOFFREY STEPHEN TAFT, #147500 was admitted to the practice of law in this state by the Supreme Court of California on July 8, 1990; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Dina DiLoreto  
Custodian of Membership Records